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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MARTHA GOODMAN
IN SUPPORT OF PLAINTIFF WAYMO'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL WAYMO'S MOTION IN
LIMINE NO. 14 AND DEFENDANTS'
RESPONSE (DKT. 1551)**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

I, Martha L. Goodman, declare as follows:

1. I am an associate at the law firm Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the District of Columbia. I make this declaration in support of Plaintiff’s Administrative Motion to File Under Seal Its Motion in Limine No. 14. (Dkt. 1551.) I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. I have reviewed the following documents and confirm that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo’s MIL No. 14	Red-outlined box
Nardinelli Declaration ISO Waymo’s MIL No. 14	Red-outlined box
Exhibit 3 to the Nardinelli Declaration ISO Waymo’s Motion in Limine No. 14	Yellow-highlighted

3. The blue highlighted portions of Waymo’s MIL No. 14, the Nardinelli declaration, and the yellow-highlighted portions of Exhibit 3 to the Nardinelli declaration contain the confidential email addresses of Uber employees and contact information for Uber employees, the disclosure of which would threaten the privacy of individuals at a company that is currently the subject of extensive media coverage.

4. Defendants’ request to seal is narrowly tailored to those portions of Waymo’s MIL No. 14, the Nardinelli declaration, and Exhibit 3 that merit sealing.

5. Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the highlighted versions documents at issue, with accompanying chamber copies.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 18th day of September, 2017, in Washington, DC.

/s/ Martha L. Goodman

Martha L. Goodman

ATTESTATION OF E-FILED SIGNATURE

I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Martha L. Goodman has concurred in this filing.

/s/ Karen L. Dunn

Karen L. Dunn